## **REMARKS**

# Claim Objections

The Examiner has objected to claims 1 and 14 due to informalities. With respect to the objection, Applicant has rectified the informalities in claims 1 and 14. Applicant respectfully requests withdrawal of the Examiner's objections to claims 1 and 14.

## Claim Rejections – 35 U.S.C. § 112

The Examiner has rejected claims 1, 4, 7, 16, 17, and 18 under 35 U.S.C §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. With respect to the rejection, Applicant has rectified the referenced claims by providing sufficient antecedent basis for claims 1, 4, 7, 16, 17, and 18. Applicant respectfully requests withdrawal of the 35 U.S.C. 112 rejection of claims 1, 4, 7, 16, 17, and 18.

### Claim Rejections – 35 U.S.C. § 102

The Examiner has rejected claims 1-5, 7-11, 13-18, and 20 under 35 U.S.C §102, as being anticipated by U.S. Patent No. 6,243,774 B1 to Eide et al. ("<u>Eide</u>"). For the reasons set forth below, Applicant asserts that the cited reference fails to teach or render obvious Applicant's invention as claimed in claims 1-5, 7-11, 13-18, and 20.

<u>Eide</u> discloses a method "of managing computer resources [to]... facilitate concurrent maintenance operations by automatically re-associating existing resources in a computer... with appropriate hardware devices installed into the computer after a concurrent maintenance operation has been performed." (<u>Eide</u> abstract lines 1-6) "A

09/607,875 - 7 -

resource data structure may include... a resource identifier that identifies the resource to computer applications and other potential users of the resource on the computer." (Eide column 9, lines 1-4) "To map the resource to a hardware device, a location identifier, a device type identifier and a device identifier are provided. The location identifier provides an indication of where the associated hardware device is located in the computer..." (Eide column 9, lines 7-11) Essentially Eide discloses a resource data structure (Eide Figure 2, item 40) that includes only information about the device and the resource in question such as a location identifier, a device type identifier, and a resource identifier among others. Specifically, this resource data structure stores information associated with an individual hardware device.

With respect to independent claim 1 in the presently claimed invention, Applicant teaches and claims "A method comprising identifying a device by a unique identifier, obtaining the unique identifier, and using the unique identifier in conjunction with a mapping table, wherein the mapping table contains at least a column containing unique identifiers of devices coupled to a column containing addresses of drivers for those devices, to obtain an address of a driver for the device." The mapping table, at a minimum, associates unique device identifiers with corresponding addresses of device drivers for those devices. This mapping table creates an efficient way for any hardware device to locate its one or more device drivers in storage without having to store the specific address of the one or more device drivers itself. By simply looking up of the unique identifier in the mapping table any device can immediately get the address of its associated driver. Eide does not in any way disclose a mapping table, only a resource data structure that stores information for the individual device and its resource. Thus, the

09/607,875 - 8 -

Eide's resource data structure are fundamentally different. Eide's resource data structure does not consist of a table that maps unique device identifiers to their respective driver addresses, as does the presently claimed invention. Thus, because Eide does not teach the presently claimed invention, Applicant respectfully submits that Eide does not anticipate claim 1.

Claims 2-5 are dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that <u>Eide</u> does not anticipate claims 2-5.

In regard to independent claims 7 and 14, <u>Eide</u> does not anticipate Applicant's invention for the same reason as independent claim 1. Again, the functional purpose of Applicant's presently claimed invention's mapping table structure and <u>Eide's</u> resource data structure are entirely different. As such, <u>Eide</u> does not in any way disclose a mapping table, which is fundamental to Applicant's invention. Thus, because <u>Eide</u> does not teach the presently claimed invention, Applicant respectfully submits that <u>Eide</u> does not anticipate claims 7 and 14.

Furthermore, claims 8-11 and 13 are dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Eide does not anticipate claims 8-11 and 13.

Additionally, claims 15-18 and 20 are dependent upon independent claim 14.

Thus, for at least the same reasons advanced above with respect to independent claim 14,

Applicant respectfully submits that Eide does not anticipate claims 15-18 and 20.

As such, <u>Eide</u> does not teach or anticipate Applicant's invention as claimed in pending claims 1-5, 7-11, 13-18, and 20. Applicant respectfully requests withdrawal of the 35 U.S.C. 102 rejection of claims 1-5, 7-11, 13-18, and 20.

## Claim Rejections – 35 U.S.C. § 103

The Examiner has rejected claims 6, 12, and 19 under 35 U.S.C §103(a) as being unpatentable over U.S. Patent No. 6,243,774 B1 to Eide et al. ("Eide") in view of Internet Engineering Task Force ("Task Force"), Simple Service Discovery Protocol/1.0, Operating without an Arbiter, October 29, 1999. For the same reasons set forth above in regard to Eide in view of the response to the 35 U.S.C §102 rejection, Applicant asserts that the cited references fail to teach, suggest, or render obvious Applicant's invention as claimed in claims 6, 12, and 19.

Claim 6 is dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that <u>Eide</u> and <u>Task Force</u>, taken alone or in combination, do not render this dependent claim obvious.

Claim 12 is dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that <u>Eide</u> and <u>Task Force</u>, taken alone or in combination, do not render this dependent claim obvious.

Claim 19 is dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully

09/607,875 - 10 -

42390.P6656 <u>PATENT</u>

submits that <u>Eide</u> and <u>Task Force</u>, taken alone or in combination, do not render this dependent claim obvious.

Thus, <u>Eide</u> and <u>Task Force</u> do not teach, suggest, or render obvious Applicant's invention as claimed in pending claims 6, 12, and 19. Applicant respectfully requests withdrawal of the 35 U.S.C. 103(a) rejection of claims 6, 12, and 19.

42390.P6656 <u>PATENT</u>

If there are any additional charges, please charge Deposit Account No 02-2666.

If a telephone conference would facilitate the prosecution of this application, the

Examiner is invited to contact James H. Salter at (408) 720-8300.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: **E/13/**, 2003

James H/Salter (Reg. No. 35,668)

12400 Wilshire Boulevard Seventh Floor Los Angeles, CA 90025-1026

(408) 720-8300

#### FIRST CLASS CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450

On	June 18, 2003	
	Date of Deposit	
	Claire Wallters	
	Name of Person Mailing Correspondence	
	Ciane Wallten	6/18/2003
	Signature	Date